

**REMARKS**

Claims 1-8, 10-21, 23-34 and 36-39 are pending in this application. By this Amendment, claims 1, 14 and 27 are amended. No new matter is added. Reconsideration of the application is respectfully requested.

The courtesies extended to Applicants' representatives by Examiner Vu at the interview held April 2, 2008, are appreciated. The reasons presented at the interview as warranting favorable action are incorporated into the remarks below, which constitute Applicants' record of the interview.

The Office Action rejects claims 1-4, 6-8, 10, 11, 13-17, 19-21, 23, 24, 26-30, 32-34, 36, 37, 39 and 40 under 35 U.S.C. §102(e) over U.S. Patent No. 6,968,511 to Robertson et al. ("Robertson"). As discussed in the February 29, 2008 Amendment, the cancellation of claim 40 by the Amendment filed August 15, 2007 renders this rejection moot. The rejection of the remaining claims is respectfully traversed.

Claims 1, 14 and 27 each recite that a predetermined distance is at least one of a distance from the closest object in the second object/group to the first object/group, a distance from the weighted center of the second object/group to the first object/group, and a distance from a boundary of the second object/group to the first object/group. This feature is supported in, for example, the specification at paragraph [0027] and Fig. 1. As discussed at paragraph [0027], the distance from the center of a group is the distance from the center of each object in the group. Therefore, the center of the group may be determined by weighting the location each object in the group.

During the interview, it was agreed that Robertson does not teach a distance from the closest object in the second object/group to the first object/group, and a distance from a boundary of the second object/group to the first object/group. With respect to the distance from the center of the second object/group to the first object/group, Examiner Vu asserted

that the location of the cluster indicator of Robertson is the center of the group because in Robertson a boundary is defined by a distance from the cluster indicator, and when an object is moved inside the boundary, the object becomes a member of the group.

However, as discussed during the interview, the cluster indicator is located at the center of the boundary, not the center of the objects. That is, in Robertson, even if the objects are located on one side of an area within the boundary, the "center" remains at the same location. Therefore, as agreed to during the interview, in Robertson, the "center" does not depend on the location of the objects of the group inside the boundary.

Therefore, at least for these reasons, Applicants respectfully submit that claims 1, 14 and 27 are patentable over Robertson.

Claims 2-4, 6-8, 10, 11, 13, 15-17, 19-21, 23, 24, 26, 28-30, 32-34, 36, 37 and 39 are allowable at least for their dependence on allowable base claims, as well as for the additional features they recite. Accordingly, withdrawal of the rejection is respectfully requested.

The Office Action rejects claims 5, 12, 18, 25, 31 and 38 under 35 U.S.C. §103(a) over Robertson and U.S. Patent No. 5,371,844 to Andrew et al. (Andrew). This rejection is respectfully traversed.

Andrew does not overcome the deficiency of Robertson with respect to claims 1, 14 and 27. Therefore, claims 5, 12, 18, 25, 31 and 38 are patentable over the applied references at least for their dependence on the allowable claims, as well as for the additional features they recite. Accordingly, withdrawal of the rejection is respectfully requested.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of the claims are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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